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C. DUKES SCOTT  
EXECUTIVE DIRECTOR

P.O. Box 11263  
Columbia, S.C. 29211



Phone: (803) 737-0800  
Fax: (803) 737-0801

DAN E. ARNETT  
CHIEF OF STAFF

July 15, 2005

**VIA HAND DELIVERY**

Charles L.A. Terreni, Esquire  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Dr., Suite 100  
Columbia, SC 29210

Re: Application of South Carolina Electric and Gas Company for  
Adjustments in the Company's Natural Gas Rate Schedules and Tariffs  
**Docket No.: 2005-113-G**

Dear Charles:

For your docket, please find enclosed a copy of the Office of Regulatory Staff's Third Continuing Data Request which was served on SCE&G. Also, please date stamp the extra copy and return it to me via the enclosed self-addressed stamped envelope.

Please let me know if you have any questions.

Sincerely,

C. Lessie Hammonds

Enclosures

cc: Scott Elliott, Esquire (w/enclosure)  
Paige Gossett, Esquire (w/enclosure)  
David A. McCormick, Esquire (w/enclosure)  
Catherine D. Taylor, Esquire (w/enclosure)  
Mitchell Willoughby, Esquire (w/enclosure)  
Belton T. Zeigler, Esquire (w/enclosure)  
Frank Knapp, Jr. (w/enclosure)

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2005-113-G**

2005 JUL 15 PM 4:35  
SO. CAROLINA  
PUBLIC SERVICE COMMISSION

IN RE: South Carolina Electric & Gas Company's ) Application For Increases In ) Gas Rates And Charges ) _____ )	<b>OFFICE OF REGULATORY STAFF'S THIRD CONTINUING DATA REQUEST</b>
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**TO: CATHERINE TAYLOR, BELTON T. ZEIGLER, PAIGE J. GOSSETT AND  
MITCHELL WILLOUGHBY, ATTORNEYS FOR SOUTH CAROLINA  
ELECTRIC & GAS COMPANY:**

Pursuant to S.C. Code Ann. Section 58-4-10, 58-4-50, and 58-4-55, as enacted by 2004 S.C. Acts 175, and 26 S.C. Code Regs. 103-853 (Supp. 2003), the Office of Regulatory Staff hereby serves the Third Continuing Data Request upon South Carolina Electric & Gas Company (hereafter referred to as "SCE&G" or "the Company").

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-853 (Supp. 2003), that you answer the following data requests in writing and under oath within ten (10) days after service, the same to be served upon the undersigned at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. When asked to identify or provide a document, "identify" and "provide" means to provide a full and detailed description of

the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

**IT IS THEREFORE REQUESTED:**

- I. That all information requested below, unless otherwise specified, shall be limited to Company's South Carolina Natural Gas Retail Operations for the period under review in this docket.
- II. That all information shall be provided to the South Carolina Office of Regulatory Staff in the format requested.
- III. That all responses to the data requests below be labeled using the same numbers as used herein.
- IV. That the requested information be bound in 3-ring binders with numbered tabs between each question.
- V. That if information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place in the Data Request in the appropriate numerical sequence.
- VI. That any inquiries or communications relating to questions concerning clarification of the data requested below should be directed to Jay Jashinsky or John W. Flitter, of the South Carolina Office of Regulatory Staff.
- VII. That this entire list of questions be reproduced and included in front of each set of responses.
- VIII. That each question be reproduced and placed in front of the response provided.

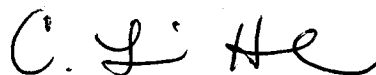
- IX. That the Company provide ten (10) paper copies of responses to the South Carolina Office of Regulatory Staff. In addition and if technically feasible, it is requested that the Company provide an electronic version of the responses.
- X. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- XI. That in addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XII. This Data Request shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.
- XIII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.

### **REQUESTS**

- 3.1 With reference to page 4, lines 14-18 of the pre-filed direct testimony of Dr. R. Glenn Hubbard, please provide copies of the cited articles.
- 3.2 With reference to page 19, lines 8-11 and 18-19, page 37, lines 3-5, and page 38, lines 19-22 of the pre-filed direct testimony of Dr. R. Glenn Hubbard, please provide copies of the relevant material on the small firm premium from the Ibbotson publication.
- 3.3 With reference to page 37, lines 6-10 of the pre-filed direct testimony of Dr. R. Glenn Hubbard, please provide a list of the companies used in the analysis on an annual basis.
- 3.4 With reference to page 38, lines 6-8 of the pre-filed direct testimony of Dr. R. Glenn Hubbard, please provide a detailed summary of the methodology employed to adjust betas, as well as the associated work papers, in estimating the adjusted betas in the study.
- 3.5 With reference to page 38, lines 12-13, and Exhibit No. (RGH-8) of the pre-filed direct testimony of Dr. R. Glenn Hubbard, please provide copies of all workpapers and the output from all regressions. Please clearly define and identify the variables employed in the analysis.
- 3.6 With reference to page 44, lines 12-18 of the pre-filed direct testimony of Dr. R. Glenn Hubbard, please provide the results of the investigation of the existence of

WNAs in the sample of gas distribution companies, including copies of all source documents used.

- 3.7 With reference to page 45, lines 7-20 of the pre-filed direct testimony of Dr. R. Glenn Hubbard, please indicate whether any study has been performed on the sample of 22 gas distribution companies in Dr. Hubbard's Exhibit No. RGH-4 to see if they have similar ratemaking mechanisms. Please provide copies of any such studies.
- 3.8 With respect to the WNA, PGA, ISP-R and RSA, please indicate why these ratemaking features are beneficial to the company and its customers if they do not reduce the risk and capital costs of SCE&G-GD?
- 3.9 With reference to Exhibit Nos. RGH-4, RGH-5, RGH-6, RGH-8A, and RGH-11B of the pre-filed direct testimony of Dr. R. Glenn Hubbard, please provide electronic copies in Microsoft Excel format.
- 3.10 Please provide copies of any presentations or reports made by SCANA or SCE&G to rating agencies in 2003, 2004 or 2005 in which gas distribution was all or part of the subject matter.
- 3.11 Please provide the quarterly balances and embedded cost for the past three years in hard copy and Microsoft Excel electronic format, for short-term debt, for SCANA and for SCE&G.
- 3.12 Please provide the quarterly balances and embedded cost for the past three years in hard copy and Microsoft Excel electronic format for total capital, long-term debt, preferred stock, and common equity figures for SCANA and for SCE&G.



Florence P. Belser, Esquire  
Shannon Bowyer Hudson, Esquire  
C. Lessie Hammonds, Esquire  
**South Carolina Office of Regulatory Staff**  
PO Box 11263 (29211)  
1441 Main St., Ste. 300  
Columbia, SC 29201  
(803) 737-0800

July 15, 2005

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2005-113-G**

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RECEIVED  
COMM. OF REG.

IN RE: South Carolina Electric & Gas Company's )  
Application For Increases In )  
Gas Rates And Charges )  
\_\_\_\_\_ )

**CERTIFICATE OF SERVICE**

This is to certify that I, Rena Grant, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the **THIRD CONTINUING DATA REQUEST** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

Scott Elliott, Esquire  
**Elliott & Elliott, P.A.**  
721 Olive Street  
Columbia, SC 29205

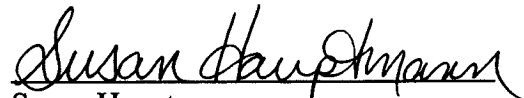
Mitchell Willoughby, Esquire  
Paige Gossett, Esquire  
**Willoughby & Hoefer, P.A.**  
PO Box 8416  
Columbia, SC 29202

David A. McCormick, Esquire  
**Department of Defense & Federal Executive Agencies**  
**US Army legal Servcies Agency**  
901 North Stuart Street, Room 713  
Arlington, VA 22203-1837

Frank Knapp, Jr., Esquire  
118 East Selwood Lane  
Columbia, SC 29212

Catherine D. Taylor, Esquire  
**SCANA Corporation**  
Legal Department  
1426 Main Street, 13<sup>th</sup> Floor  
Columbia, SC 29201

Belton T. Zeigler, Esquire  
**Haynsworth Sinkler & Boyd, P.A.**  
PO Box 11889  
Columbia, SC 29211

  
Susan Hauptmann

July 15, 2005  
Columbia, South Carolina